

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

RAMON RIVERA TORRES  
ANA M RIVERA

DEBTOR(S)

CASE NO: 10-09829

CHAPTER 13

**MOTION TO INFORM**  
**POST CONFIRMATION MODIFICATION PLAN UNDER §1329**

TO THE HONORABLE COURT:

**NOW COMES** the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to adjust payment schedule.

**WHEREFORE**, it is respectfully requests this Honorable Court to take notice of the aforementioned.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor(s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

**In San Juan, Puerto Rico this 20th day of June of 2011.**

JPC LAW OFFICE

José M Prieto Carballo, Esq.  
P.O. Box 363565  
San Juan, P.R. 00936-3565  
Tel (787) 607-2066 & Tel (787) 607-2166  
jpc@jpclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court  
District of Puerto Rico**

**IN RE:**

RIVERA TORRES, RAMON & RIVERA, ANA M

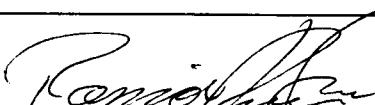
Debtor(s)

Case No. 10-09829-13

Chapter 13

**CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee  directly  by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

<p>PLAN DATED: _____  <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION</p> <p><b>I. PAYMENT PLAN SCHEDULE</b></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%;">\$</td> <td style="width: 10%;">800.00</td> <td style="width: 10%;">x</td> <td style="width: 10%;">1</td> <td style="width: 10%;">= \$</td> <td style="width: 10%;">800.00</td> </tr> <tr> <td>\$</td> <td>450.00</td> <td>x</td> <td>11</td> <td>= \$</td> <td>4,950.00</td> </tr> <tr> <td>\$</td> <td>675.00</td> <td>x</td> <td>12</td> <td>= \$</td> <td>8,100.00</td> </tr> <tr> <td>\$</td> <td>875.00</td> <td>x</td> <td>12</td> <td>= \$</td> <td>10,500.00</td> </tr> <tr> <td>\$</td> <td>1,100.00</td> <td>x</td> <td>24</td> <td>= \$</td> <td>26,400.00</td> </tr> <tr> <td colspan="6" style="text-align: center;">TOTAL: \$ <u>50,750.00</u></td> </tr> </table> <p>Additional Payments:  \$ <u>1,000.00</u> to be paid as a LUMP SUM  within <u>60 months</u> with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows:</p> <p><input checked="" type="checkbox"/> Other:  FROM FUTURE TAX REFUNDS RECEIVED DURING THE LIFE OF THE PLAN</p> <p>Periodic Payments to be made other than, and in addition to the above:  \$ <u>                </u> x <u>                </u> = \$ <u>                </u></p> <p>PROPOSED BASE: \$ <u>51,750.00</u></p> <p><b>III. ATTORNEY'S FEES</b>  (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,814.00</u></p> <p></p> <p>Signed: <u>/s/ RAMON RIVERA TORRES</u>  Debtor</p> <p><u>/s/ ANA M RIVERA</u>  Joint Debtor</p>	\$	800.00	x	1	= \$	800.00	\$	450.00	x	11	= \$	4,950.00	\$	675.00	x	12	= \$	8,100.00	\$	875.00	x	12	= \$	10,500.00	\$	1,100.00	x	24	= \$	26,400.00	TOTAL: \$ <u>50,750.00</u>						<p><input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>1/10/2011</u>  Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other</p> <p><b>II. DISBURSEMENT SCHEDULE</b></p> <p>A. ADEQUATE PROTECTION PAYMENTS OR \$ _____</p> <p>B. SECURED CLAIMS:  <input type="checkbox"/> Debtor represents no secured claims.  <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> <li>1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS:  Cr. BPPR Cr. _____  # <u>071010018964240</u> # _____  \$ <u>4,200.00</u> \$ _____</li> <li>2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims:  Cr. RELIABLE FINANCIAL Cr. _____  # <u>078675809</u> # _____  \$ <u>6,506.00</u> \$ _____</li> <li>3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:  Cr. _____ Cr. _____ Cr. _____  # _____ # _____ # _____  \$ _____ \$ _____ \$ _____</li> <li>4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  COOP A/C MANATI</li> <li>5. <input type="checkbox"/> Other:</li> <li>6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:  BPPR</li> </ol> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.  11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input checked="" type="checkbox"/> Classifies <input type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> <li>1. (a) Class A: <input checked="" type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____  <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____  Cr. CANDELCOOP Cr. _____ Cr. _____  # <u>14066</u> # _____ # _____  \$ <u>38,012.00</u> \$ _____ \$ _____</li> <li>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</li> </ol> <p>OTHER PROVISIONS: (Executive contracts: payment of interest to unsecureds, etc.)  FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT  METHOD OF PAYMENT 11 USC 1325 (a)(5)</p> <p>ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.</p> <p>TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.</p> <p>DEBTOR WILL PROVIDE AN INSURANCE TO RELIABLE FIN OF \$125.00</p> <p>ADEQUATE PROTECTION TO RELIABLE FIN OF \$125.00</p>
\$	800.00	x	1	= \$	800.00																																
\$	450.00	x	11	= \$	4,950.00																																
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Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Label Matrix for local noticing

0104-3

Case 10-09829-SEK13

District of Puerto Rico

Old San Juan

Wed Dec 8 14:57:30 AST 2010

US Bankruptcy Court District of P.R.

U.S. Post Office and Courthouse Building

300 Recinto Sur Street, Room 109

San Juan, PR 00901-1964

COOP A/C MANATI

MIREYA BALTAZAR SUAZO ESQ

PO BOX 2102

BARCELONETA, PR 00617-2102

RECOVERY MANAGEMENT SYSTEMS CORP

GE MONEY BANK

PEP BOYS/CAR CARE

25 S E 2 ND AVE SUITE 1120

MIAMI, FL 33131-1605

AEE

P O BOX 364267

SAN JUAN, PR 00936-4267

BANCO SANTANDER

P O BOX 362589

SAN JUAN, PR 00936-2589

BPPR

P O BOX 366818

SAN JUAN, PR 00936-6818

CANDELCOOP

P O BOX 3249

MANATI, PR 00674-3249

(p)COOP A C DE MANATI

PO BOX 30562

MANATI PR 00674-8516

RELIABLE FINANCIAL

P O BOX 21382

SAN JUAN, PR 00928-1382

ALEJANDRO OLIVERAS RIVERA

ALEJANDRO OLIVERAS, CHAPTER 13 TRUS

PO BOX 9024062

SAN JUAN, PR 00902-4062

ANA M RIVERA

RR 9 CALLE 17

URB FLAMBOYAN

BAYAMON, PR 00926

JOSE M PRIETO CARBALLO

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SAN JUAN, PR 00901-1938

RAMON RIVERA TORRES

RR 9 CALLE 17

URB FLAMBOYAN

BAYAMON, PR 00926

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

COOP A/C MANATI

CALL BOX 30562

MANATI, PR 00674-0562

End of Label Matrix

Mailable recipients 14

Bypassed recipients 0

Total 14